

1 WRIGHT, FINLAY & ZAK, LLP
2 Darren T. Brenner, Esq.
3 Nevada Bar No. 8386
4 Lindsay D. Dragon, Esq.
5 Nevada Bar No. 13474
6 7785 W. Sahara Ave., Suite 200
7 Las Vegas, NV 89117
8 (702) 475-7964; Fax: (702) 946-1345
9 ldragon@wrightlegal.net

10 *Attorneys for Plaintiff, Wells Fargo Bank, N.A., as Trustee, for Park Place Securities, Inc. Asset-*
11 *Backed Pass-Through Certificates, Series 2005-WHQ2*

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 WELLS FARGO BANK, N.A. AS TRUSTEE
11 FOR PARK PLACE SECURITIES, INC.
12 ASSET-BACKED PASS-THROUGH
13 CERTIFICATES, SERIES 2005-WHQ2,

14 Plaintiff,

15 vs.

16 FIDELITY NATIONAL TITLE GROUP, INC.;
17 FIDELITY NATIONAL TITLE INSURANCE
18 COMPANY; LAND TITLE OF NEVADA,
19 INC.; DOE INDIVIDUALS I through X; and
20 ROE CORPORATIONS XI through XX,
21 inclusive,

22 Defendants.

Case No.: 2:21-cv-00996-APG-DJA

**STIPULATION AND ORDER TO
EXTEND TIME PERIOD TO
RESPOND TO MOTIONS TO
DISMISS [ECF Nos. 27-29]**

[First Request]

23 COMES NOW Plaintiff, Wells Fargo Bank, N.A., as Trustee, for Park Place Securities,
24 Inc. Asset-Backed Pass-Through Certificates, Series 2005-WHQ2 (“Wells Fargo Bank”) and
25 Defendants Fidelity National Title Group, Inc. (“FNTG”), Fidelity National Title Insurance
26 Company (“FNTIC”) and Land Title of Nevada, Inc. (“Land Title”, collectively the
27 “Defendants”), by and through their counsel of record, hereby stipulate and agree as follows:

- 28 1. On May 24, 2021, Wells Fargo Bank filed its Complaint in Eighth Judicial District Court,
Case No. A-21-835173-C [ECF No. 1-1];
2. On May 24, 2021, FNTIC filed a Petition for Removal to this Court [ECF No. 1];

3. On October 20, 2021, Defendants filed their respective Motions to Dismiss [ECF Nos. 27-29];
4. Wells Fargo Bank's deadline to respond to Defendants' Motions to Dismiss is currently November 3, 2021;
5. Wells Fargo Bank's counsel is requesting a brief extension until Friday, November 12, 2021, to file its responses to the pending Motions to Dismiss;
6. This extension is requested to allow counsel for Wells Fargo Bank additional time to review and respond to the points and authorities cited to in the pending Motions;
7. Counsel for Defendants does not oppose the requested extension;
8. This is the first request for an extension which is made in good faith and not for purposes of delay.

IT IS SO STIPULATED.

DATED this 3rd day of November, 2021.

DATED this 3rd day of November, 2021.

WRIGHT, FINLAY & ZAK, LLP

SINCLAIR BRAUN LLP

/s/ Lindsay D. Dragon

/s/ Kevin S. Sinclair

Lindsay D. Dragon, Esq.

Kevin S. Sinclair, Esq.

Nevada Bar No. 13474

Nevada Bar No. 12277

7785 W. Sahara Ave., Suite 200

16501 Ventura Boulevard, Suite 400

Las Vegas, NV 89117

Encino, California 91436

Attorneys for Plaintiff, Wells Fargo Bank, N.A., as Trustee, for Park Place Securities, Inc. Asset-Backed Pass-Through Certificates, Series 2005-WHQ2

Attorney for Defendants, Fidelity National Title Group, Inc. Fidelity National Title Insurance Company and Land Title of Nevada, Inc.

IT IS SO ORDERED.

Dated this 4th day of November, 2021.


UNITED STATES DISTRICT JUDGE